

3098 Unionville Rd
Halls TN 38040
731-286-2268 home
731-225-1942 cell

Dodson Farms

To: Mr. Kenneth R. Payne

Fax: 202.720.1125

From: Johnny Dodson

Date: 01/30/06

Re: Soybean Comments

Pages: 3
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Re: Fr DOC E5-6786 Federal Register.

Dec. 2, 2005 (volume 70, Number 231) [page 72257]

Concerning the Soybean Promotion and Research Order

(7 CFR 1220) [No. LS-05-07]

January 29, 2006

Mr. Kenneth R. Payne
Chief, Marketing Programs, Livestock and Seed Program
U.S. Department of Agriculture
Agriculture Marketing Service
Room 2638-S, Stop 0251
1400 Independence Avenue, SW
Washington, D.C. 20250-0251

Re: Fr DOC E5-6786 Federal Register: Dec. 2, 2005 (volume 70, Number 231) [page 72257], concerning the Soybean Promotion and Research Order (7 CFR 1220) [No. LS-05-07]

Mr. Payne,

I would like to begin by saying that I am a supporter of producer checkoffs. I think it is important that all producers invest in agricultural programs that are national in scope. Both research and promotion of our products ultimately increases the economic viability of the products we produce.

There are a number of concerns in regard to our soybean checkoff that I would like to address. To begin, the top three officers and staff of the United Soybean Board make most if not all of the critical decisions. An example would be budget allocations for the different committees. Board members have little if any input. When asked about USB investment in specific projects my USB Board representatives tell me they are not privileged to that information even though USB has spent millions of dollars on a specific project. There also is little if any accountability and transparency. USB's use of electronic voting in Board meetings does not hold anyone personally accountable for their actions.

There are specific issues in regard to the interpretation to the Act and Order that are disturbing. USB's interpretation of the Minimum Assessment has been extremely unfair to the states. Here in fact the Act and Order has not been fully complied with. As past Chair of Tennessee's QSSB, we appealed the decision of USB to the Secretary of Agriculture and as of this date and two Secretaries later, the Tennessee appeal has not been heard.

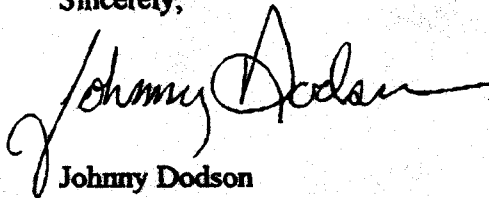
The Act and Order also calls for a 1% cap on administration cost. USB has circumvented this requirement by contracting services that were intended to be preformed within that cap. The Act also states that USB "shall contract with farmer led, not for profit,

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organizations". USB has elected to contract with for profit companies with non-compete bids. Again circumventing the intent of the legislation.

Finally, producers should have an up or down vote on the checkoff every five years. The polling process was designed to be confusing and deceiving. In the last polling, USDA determined there were 600,000 "eligible" producers requiring 60,000 votes for a referendum before an up or down vote can take place. I don't find that number to be credible. This also assures USB that there will be no challenge to the checkoff, further emboldening USB staff and leadership and distancing themselves from the grass root producers that fought for a national soybean checkoff. As I said from the start, I'm an ardent supporter of producer led checkoffs. It saddens me to see such a vital and successful program succumb to the self-preservation, self-interest, personnel agendas and misguided ideals of the USB staff and it's key leadership. These actions have and are taking precedence over the interest of soybean producers of this great nation.

Sincerely,



Johnny Dodson
3098 Unionville Rd.
Halls, TN 38040
731.286.2268
johnnydodson@bellsouth.net